

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Christian Labor Association; Kaski
Inc; Nordic Group Inc.; Roen
Salvage Co.; Luke Krhin; Shawn
Kunnari; Dylan Smith

File No.: 0:21-cv-00227-DWF-LIB

Plaintiffs,

**DECLARATION OF
CHELSEA J. HELMER**

v.

City of Duluth; City of Cloquet; City
of Two Harbors; Western Lake
Superior Sanitary District; Duluth
Building and Construction Trades
Council,

Defendants.

I, Chelsea J. Helmer, state and declare as follows:

1. I am the Director of Administrative Services for the City of Duluth. My responsibilities include serving as the City Clerk and as the Secretary of the Duluth City Council. I am responsible for keeping all City Council Records.
2. Duluth City Code Section 2-29(a) sets out the City of Duluth's policy regarding the use of project labor agreements when the City is "an owner, lessor, guarantor, pledger, investor or contributor to a development project that involves construction services."

3. Duluth City Code Section 2-29(b) provides as follows:

A project labor agreement, in substantially the form adopted by resolution of the council from time to time and kept by the city clerk as a public document, shall be required to be used on each covered project. Any project labor agreement entered into by the city shall be made binding on all contractors and subcontractors working on the project. The city shall implement the project labor agreement by requiring adherence to the agreement in the bid specifications in all relevant bid documents. No contractor shall be required to be or become a party to a collective bargaining agreement on any other construction project in order to qualify to work under a project labor agreement implemented for a covered project.

4. On Monday, March 22, 2021, the Duluth City Council adopted, by unanimous vote,

Resolution 21-0196R, making certain amendments to the form project labor

agreement. A true and correct copy of Resolution 21-0196R is attached hereto as

Exhibit 1.

5. Resolution 21-0196R includes, as Exhibit A, the current project labor agreement with

all March 22, 2021 amendments indicated in redline.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 15th day of April 2021, in St. Louis County, Minnesota.

s/Chelsea J. Helmer
Chelsea J. Helmer
Director of Administrative Services
City of Duluth
411 W 1st Street
Duluth, MN 55802